

COLSON LAW

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January 7, 2022

By ECF

Honorable Lewis Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Cole Bridges*, 21 Cr. 65 (LJL)

Dear Judge Liman:

At the status conference on December 14, 2021, the Court ordered the defense to file a notice by January 7, 2022, advising whether it intends to make motions under the Classified Information Procedures Act (CIPA) and, if so, to propose an agreed-upon motions schedule. We write with the consent of the government to respectfully request an additional three weeks to file our notice and propose a schedule for the Court's consideration. Based on classified and unclassified discussions with the government, we believe the parties may be able to reach an agreement concerning the classified discovery that would obviate the need for CIPA litigation. Should the parties fail to arrive at an agreement by January 28, 2022, we will seek leave to continue our negotiations or advise the Court of our intended motions.

Thank you for your consideration.

Respectfully submitted,

/s/

Deborah Colson
Sabrina Shroff
Attorneys for Cole Bridges

cc: Government Counsel